

Marc Dawson
P.O. Box 3030
High Desert State Prison
Susanville, CA 96127-3030
CDCR #P-13296

FILED

In Pro Per

JUL 21 2008

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
Richard W. Wlaking
U.S. District Court
Northern District of California
San Jose

Marc Dawson,

No. C 08-0741 JF (PR)

Plaintiff,

REQUEST FOR ADMISSIONS

v.

(SET ONE)

S. Latham, et al.,

(Fed.R.Civ.P.36)

Defendants,

Marc Dawson
P.O. Box 3030, Susanville, CA 96127

PROPOUNDING PARTY: PLAINTIFF MARC DAWSON
RESPONDING PARTY: DEFENDANT M. EDWARDS
SET NUMBER: ONE

TO DEFENDANT AND HER RECORD OF COUNSEL:

PLEASE TAKE NOTICE that pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff MARC DAWSON hereby requests that the Defendant M. EDWARDS is to make the following admissions within 30 days after the service of this request.

1. Attachment "A" is a report authored by M. EDWARDS.
2. M. EDWARDS entered the medical document marked exhibit "A" on 6-10-06.
3. M. EDWARDS was assigned as a health care provider on 6-10-06.
4. M. EDWARDS recorded the Plaintiffs eye opening response as "4" according to attachment "A".

1 5. M. EDWARDS recorded the Plaintiffs best verbal response, according to at-
2 tachment "A", as a "5".

3 6. M. EDWARDS recorded the Plaintiffs best motor response as a "6" according
4 to attachment "A".

5 7. M. EDWARDS recorded the Plaintiffs pupil response, in the right eye, a "B"
6 according to attachment "A".

7 8. On attachment "A" under pupil response, a "B" means "Brisk".

8 9. M. EDWARDS recorded the Plaintiffs pupil response. in the left eye, a "SL"
9 according to attachment "A".

10 10. On attachment "A" under pupil response, a "SL" means "Sluggish".

11 11. M. EDWARDS recorded the Plaintiffs pupil size, in the right eye, as being
12 a "4" according to attachment "A".

13 12. M. EDWARDS recorded the Plaintiffs pupil size, in the left eye, as a "3",
14 according to attachment "A".

15 13. M. EDWARDS recorded a difference in the Plaintiff right eye in comparison
16 to the left eye, according to attachment "A".

17 14. M. EDWARDS used a number scale to identify responses in the 2 boxes under
18 the heading of "Glasgow Coma Scale", according to attachment "A".

19 15. M. EDWARDS is knowledgable with the "Glasgow Coma Scale".

20 16. The Plaintiff notified M. EDWARDS that he had taken the wrong medication,
21 on Thursday, and the problems began afterwards, according to attachment "A".

22 17. M. EDWARDS recorded that the Plaintiffs muscles in his arms and legs were
23 "twitchy and jumpy", according to attachment "A".

24 18. M. EDWARDS recorded that the Plaintiffs head was bent in a forward manner
25 and that the Plaintiff stated that it felt as if someone was pushing down on his head,
26 according to attachment "A".

27 19. M. EDWARDS recorded that the Plaintiff could not put his head straight ac-
28 cording to attachment "A".

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20. M. EDWARDS did not draw a blood sample from the Plaintiff on 6-10-06.

21. M. EDWARDS did not implement any procedures that would help to identify what the Plaintiff had taken on 6-8-06.

22. M. EDWARDS, after recording the Plaintiffs physical symptoms and condition on 6-10-06, according to attachment "A", did not implement any procedures that would identify what the Plaintiff had ingested on 6-8-06.

23. M. EDWARDS referred the Plaintiff to see the PCP on Monday, 6-12-06.

24. M. EDWARDS recorded the referral to see a PCP Monday, 6-12-06, on page 2 of attachment "A".

25. The Plaintiff informed M. EDWARDS on 6-10-06 that he had taken medication that was not his on Thursday, according to attachment "A".

26. According to attachment "A", Thursday would have been 6-8-06.

27. The time period between 6-8-06 through 6-12-06 is 4 days.

28. M. EDWARDS did not instruct any health care providers assigned to PBSP building A-1 to monitor Plaintiffs vital signs.

29. M. EDWARDS did not do any type of follow-up to check if the Plaintiff, in regards to her referral on attachment "A", had seen a PCP on 6-12-06.

30. M. EDWARDS is familiar with the medical procedures implemented at PBSP on 6-10-06.

31. M. EDWARDS was employed as a Registered Nurse at PBSP on 6-10-06.

32. When an inmate takes an unknown poison or toxic substance, efforts are made to identify the substance in order to counteract the effects.

Dated: *July 11th, 2008*

/s/ Marc Dawson, Plaintiff
Marc Dawson, Plaintiff

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ATTACHMENT
A

EMERGENCY CARE FLOW SHEET

CALIFORNIA DEPARTMENT OF CORRECTIONS

BSP 7206

NAME LAST DAWSON	FIRST MARC	CDC NUMBER P13296	HOUSING A01U203U	DOB 01-14-1964
TIME OF INCIDENT approx all day	LOCATION OF INCIDENT cell	MODE OF ARRIVAL ambulatory		
STAFF	NAME LAST FIRST	OCCUPATION	SEX	AGE
CHIEF COMPLAINT		TB CODE 22	DATE OF LAST TETANUS unknown	

MECHANISM OF INJURY	SKIN COLOR	SKIN TEMP	SKIN MOISTURE	CAPILLARY REFILL	GLASCOW GOMA SCALE						
<input type="checkbox"/> STABBING <input type="checkbox"/> PHYSICAL ALTERCATION <input type="checkbox"/> GUNSHOT WOUND <input type="checkbox"/> BURN <input type="checkbox"/> SPORTS INJURY <input type="checkbox"/> ON THE JOB INJURY <input checked="" type="checkbox"/> OTHER feeling jittery with strobing lights in eyes & like someone is pushing his head	<input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> PALE <input type="checkbox"/> ASHEN <input type="checkbox"/> CYANOTIC <input type="checkbox"/> FLUSHED	<input type="checkbox"/> HOT <input type="checkbox"/> WARM <input checked="" type="checkbox"/> COOL <input type="checkbox"/> COLD	<input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> DRY <input type="checkbox"/> MOIST <input type="checkbox"/> PROFUSE	<input checked="" type="checkbox"/> < 2 SECONDS <input type="checkbox"/> > 2 SECONDS <input type="checkbox"/> NONE	TIME 1940 <table border="1"> <tr> <th>EYE OPENING RESPONSE</th> <th>BEST VERBAL RESPONSE</th> <th>BEST MOTOR RESPONSE</th> </tr> <tr> <td>4</td> <td>5</td> <td>6</td> </tr> </table>	EYE OPENING RESPONSE	BEST VERBAL RESPONSE	BEST MOTOR RESPONSE	4	5	6
EYE OPENING RESPONSE	BEST VERBAL RESPONSE	BEST MOTOR RESPONSE									
4	5	6									

LUNG SOUNDS	RESP CHARACTER	EVIDENCE OF TRAUMA
RT <input checked="" type="checkbox"/> CLEAR <input type="checkbox"/> WHEEZES <input type="checkbox"/> RALES <input type="checkbox"/> RHOTICHI <input type="checkbox"/> SHED <input type="checkbox"/> ABSENT	LT <input checked="" type="checkbox"/> UNLABORED <input type="checkbox"/> PAINFUL <input type="checkbox"/> SHALLOW <input type="checkbox"/> DEEP <input type="checkbox"/> RETRACTION <input type="checkbox"/> NASAL FLARING	<input type="checkbox"/> CHEST <input type="checkbox"/> ABDOMEN <input type="checkbox"/> G/U <input type="checkbox"/> PELVIS <input type="checkbox"/> BACK SPINE <input type="checkbox"/> HEAD <input type="checkbox"/> NECK <input type="checkbox"/> EXTREMITIES <input type="checkbox"/> OTHER

TIME	TEMP	PULSE	RESP	TBP	SaO2	CURRENT MEDICATIONS
06-10-2006 2001	97.6	82	20	123/84	98	NEURONTIN 250MG/5ML SOLN 1000 MG, OMEPRAZOLE 20MG CAPSULE DR 20 MG
TIME	NAME	SITE	GAUGE	RATE	MEDICATION ALLERGIES	
					ASPIRIN, NSAIDS, ASPIRIN, NSAIDS, N D CLEAR, NAPROXEN SODIUM.	
TIME	ROUTE	RATE	SaO2			

TIME	PUPIL RESPONSE	PUPIL SIZE
1940	R L SL B	R L 4 3
KEY C=CLOSE B=BRISK SL=SLUGGISH F=FIXED 3 4 5 6 7 8		

SIGNATURES	PATIENT DISPOSITION	PATIENT CONDITION ON DISCHARGE
RN/MT/AMD RN/MT/AMD RN/MT/AMD RN/MT/AMD SUPERVISOR REVIEW <i>J. Brown SRU/IT</i>	RTC MODE OF DEPARTURE <i>Ambl.</i>	TIME <i>2003</i>

SOAP NOTATIONS		
SUBJECTIVE (PATIENT'S STATEMENTS, HISTORY)		
OBJECTIVE (PHYSICAL EVALUATION)		
DATE/TIME	DESCRIPTION	NOTES

DATE/TIME		DESCRIPTION	NOTES
PLAN/PT EDUCATION FOLLOWUP MD ORDERS ETC			
		DESCRIPTION	NOTES
06-10-2006 2000		DIPHENHYDRAMINE 25MG CAPLET	VO Risenhoover FNP

Notes:

06-10-2006 2003

S-" I took the wrong medicine Thursday & this muscle, eye & neck things started Friday in group."

O- A&O x4, resp even & unlabored, skin cool & dry with good capillary refill, eyes react to light but R pupil is one size larger than L pupil, MAE. Muscles in arms & legs are twitching & jumpy. Head is bent forward & states feels like someone is pushing it down. Can't put his neck straight so head is upright. Denies any pain-just above problems.

A- alt in sensory perception R/T muscle, eye & neck problems.

P- MOD called & report given. New orders received. Instructed to rest & drink lots of water. To see PCP on Monday 6-12-06

for all his symptoms. RTC. M Edwards RN